

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

JENIKE ALLEN, et al., : CASE NO: 1:22-cv-00358

Plaintiffs, : JUDGE MICHAEL R. BARRETT
vs. :
vs. :
vs. :

ANGEL'S CARE FAMILY HOME, : AFFIDAVIT OF JENIKE ALLEN
INC., et al. :
vs. :

Defendants.

STATE OF: Ohio)
COUNTY OF: Hamilton) SS:

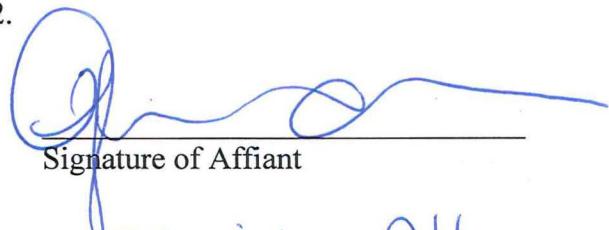
Jenike Allen, having first been duly sworn under oath of truth hereby states as deposes as follows:

1. My name is Jenike Allen, an adult female citizen of Ohio. I make this affidavit on the basis of my personal knowledge.
2. I never graduated college.
3. I was most recently hired by Defendants Angel's Care Family Home, Inc. and/or Todd Sloan and/or Lisa Sloane ("Defendants") in or about May 2019.
4. I voluntarily resigned my employment with Defendants in or about August 2022.
5. I was employed as an hourly Caregiver at Defendants' facility located at 688 Middleton Way in Loveland, Ohio.
6. My duties included cooking and cleaning for the residents of the facility, assisting the residents with dressing themselves and using the bathroom, doing the residents' laundry, and taking out trash at the facility.

7. During my employment with Defendants, I not paid overtime for all hours worked in excess of forty (40) hours per workweek.
8. Instead, I was paid straight time until I worked at least sixty (60) hours in a workweek, then I was paid overtime for hours worked in excess of sixty (60).
9. The above pay structure was a policy maintained by Defendants.
10. The Employee Earnings Records attached to the Complaint (ECF No. 1, PAGEID #s 10-12) in this matter are true and correct copies of many of my check stubs from my time working at Defendants.
11. While I was employed by Defendants, other Caregivers informed me they were paid in a similar manner; specifically, not being paid overtime for all hours worked in excess of forty (40) in a workweek.
12. Because I am no longer employed by Defendants, I do not know how many of my former co-workers remain in Defendants' employ.

FURTHER AFFIANT SAYETH NAUGHT

Witness my signature this 12 day of October, 2022.



Signature of Affiant

Jenike Allen
Printed Name of Affiant

SWORN to and subscribed before me this 12th day of October, 2022.



Notary Public

My Commission Expires: Does NOT EXPIRE



Robb Schneiderman Stokar, Attorney At Law
NOTARY PUBLIC - STATE OF OHIO
My commission has no expiration date
Sec. 147.03 R.C.